

### REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-31 were previously pending.

#### 35 U.S.C. § 103

Claims 1-8, 10, 12-14, 17-23 and 26-30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,349,343 to Foody et al. (hereinafter "Foody") in view of U.S. Patent No. 5,761,494 to Smedley et al. (hereinafter "Smedley"). Applicant respectfully submits that claims 1-8, 10, 12-14, 17-23 and 26-30 are patentable over Foody in view of Smedley.

Foody discloses:

A system and method in accordance with a preferred embodiment enable objects from two or more heterogeneous object systems in a digital computer to interoperate and be combined in the creation of a larger object-oriented software project, as well as uses of such system and method. Objects from a foreign object system are unmodified, yet appear to be native to the object system in which they are used or accessed. A native proxy object (indistinguishable from other native objects) is constructed for the real foreign object. The proxy object contains an identifier to the real object, as well as a pointer to a software description of how to access and manipulate the object – e.g., how to call its methods, set its properties, and handle exceptions. When the proxy object is manipulated, it follows the instructions in the software description which, in turn, results in the corresponding manipulation of the foreign object. Abstract.

The Smedley reference discloses:

A process to access an IMS transaction based computer system from a structured query language (SQL) application program without revising or migrating the transaction based system. Binary virtual table mappings are built. An SQL statement from the SQL application program is parsed.

Virtual column to transaction utilization mappings are extracted from the SQL statement. A possible solution set or solution sets are generated which may be capable of satisfying the SQL statement. Thereafter, transaction costs for each potential solution set are determined. Finally, a solution set with the lowest cost to satisfy the SQL statement is executed. Abstract.

Applicant respectfully submits that claim 1 of the present application is not unpatentable over Foody in view of Smedley. Claim 1 of the present application recites:

An application program interface embodied on one or more computer readable media, comprising:  
 a first namespace related to data shared by a plurality of data providers;  
 a second namespace related to data used in an object-oriented database;  
 a third namespace related to data used by an SQL client; and  
 a fourth namespace related to native data types within an SQL server.

The Foody reference fails to disclose or suggest an application program interface that includes a first namespace related to data shared by a plurality of data providers. The Office Action alleges support for this portion of claim 1 at column 7, lines 57-61. The cited language discloses:

(C) a system and method to enable object classes and objects to be relocated among applications and servers in one or more object systems while the applications and servers are executing, and without disruption of software utilizing said object classes and objects, even if it too is executing.

The cited language discusses the relocation of object classes and objects among applications and servers, which is different from the recitation in claim 1. The

relocation of object classes and objects is not the same as an application program interface that includes a first namespace related to data shared by a plurality of data providers.

Furthermore, the Smedley reference discloses a process that accesses a system using an SQL application program. The Smedley reference further discloses building various mappings and handling SQL statements. This disclosure of Smedley is different from the language of claim 1. The SQL application program and other aspects of the Smedley reference do not disclose an application program interface that includes a first namespace related to data shared by a plurality of data providers. Thus, applicant submits that neither Foody nor Smedley individually disclose or suggest a recited element of claim 1. Further, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 1. Accordingly, applicant submits that claim 1 of the present application is patentable over Foody in view of Smedley.

Given that claims 2-8, 10 and 12-13 depend from claim 1, applicant respectfully submits that claims 2-8, 10 and 12-13 are likewise allowable over Foody in view of Smedley for at least the reasons discussed above with respect to claim 1.

Applicant respectfully submits that claim 14 of the present application is not unpatentable over Foody in view of Smedley. Claim 14 of the present application recites:

An application program interface embodied on one or more computer readable media, comprising:  
a first group of services related to sharing data among a plurality of data providers;

a second group of services related to using data in an object-oriented database;  
a third group of services related to data used by a database client;  
and  
a fourth group of services related to data types used by a database server.

As discussed above, the Foody reference fails to disclose or suggest an application program interface that includes a first group of services related to sharing data among a plurality of data providers. Further, applicant submits that the Smedley reference fails to disclose or suggest first group of services related to sharing data among a plurality of data providers. Since neither Foody nor Smedley individually disclose or suggest a recited element of claim 14, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 14. Accordingly, applicant submits that claim 14 of the present application is patentable over Foody in view of Smedley.

Given that claims 15 and 17-21 depend from claim 14, applicant respectfully submits that claims 15 and 17-21 are likewise allowable over Foody in view of Smedley for at least the reasons discussed above with respect to claim 14.

Applicant respectfully submits that claim 22 of the present application is not unpatentable over Foody in view of Smedley. Claim 22 of the present application recites:

A method comprising:  
creating a common namespace related to data shared by a plurality of data providers;  
creating an object-oriented namespace related to data used in object-oriented databases;

creating an SQL client namespace related to data used by SQL clients; and  
creating an SQL types namespace related to native data types in an SQL server.

For the reasons discussed above with respect to claim 1, the Foody reference fails to disclose or suggest a method that includes creating a common namespace related to data shared by a plurality of data providers. Furthermore, the Smedley reference fails to disclose or suggest creating a common namespace related to data shared by a plurality of data providers. Since neither Foody nor Smedley individually disclose or suggest a recited element of claim 22, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 22. Accordingly, applicant submits that claim 22 of the present application is patentable over Foody in view of Smedley.

Given that claim 23 depends from claim 22, applicant respectfully submits that claim 23 is likewise allowable over Foody in view of Smedley for at least the reasons discussed above with respect to claim 22.

Applicant respectfully submits that claim 26 of the present application is not unpatentable over Foody in view of Smedley. Claim 26 of the present application recites:

A computer system including one or more microprocessors and one or more software programs, the one or more software programs utilizing an application program interface to request services from an operating system, the application program interface including separate commands to request services consisting of the following groups of services:

a first group of services related to sharing data among a plurality of data providers;

a second group of services related to utilizing data stored in an object-oriented database;

a third group of services related to data used by a database client;  
and  
a fourth group of services related to data types used by a database server.

For the reasons discussed above with respect to claim 1, the Foody reference fails to disclose or suggest a computer system including an application program interface to request services from an operating system, the application program interface including separate commands to request services consisting of a first group of services related to sharing data among a plurality of data providers. Further, applicant submits that the Smedley reference fails to disclose or suggest a computer system including an application program interface to request services from an operating system, the application program interface including separate commands to request services consisting of a first group of services related to sharing data among a plurality of data providers. Since neither Foody nor Smedley individually disclose or suggest a recited element of claim 26, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 26. Accordingly, applicant submits that claim 26 of the present application is patentable over Foody in view of Smedley.

Applicant respectfully submits that claim 27 of the present application is not unpatentable over Foody in view of Smedley. Claim 27 of the present application recites:

A method comprising:  
managing network and computing resources for a distributed computing system; and  
exposing a set of functions that enable developers to access the network and computing resources of the distributed computing system, the set of functions comprising first functions to facilitate data sharing, second functions to facilitate accessing object-oriented databases, third functions to

facilitate SQL client operations, and fourth functions to facilitate SQL server operations.

For the reasons discussed above with respect to claim 1, Foody fails to disclose or suggest a method that exposes a set of functions that enable developers to access the network and computing resources of a distributed computing system, such that the set of functions includes first functions to facilitate data sharing. Further, applicant submits that the Smedley reference fails to disclose or suggest a method that exposes a set of functions that enable developers to access the network and computing resources of a distributed computing system, such that the set of functions includes first functions to facilitate data sharing. Since neither Foody nor Smedley individually disclose or suggest a recited element of claim 27, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 27. Accordingly, applicant submits that claim 27 of the present application is patentable over Foody in view of Smedley.

Applicant respectfully submits that claim 28 of the present application is not unpatentable over Foody in view of Smedley. Claim 28 of the present application recites:

A method comprising:  
calling one or more first functions to facilitate sharing of data among multiple data providers;  
calling one or more second functions to facilitate accessing object-oriented databases;  
calling one or more third functions to facilitate SQL client operations; and  
calling one or more fourth functions to facilitate SQL server operations.

For the reasons discussed above with respect to claim 1, the Foody reference fails to disclose or suggest a method comprising calling one or more first functions to facilitate sharing of data among multiple data providers. Further, applicant submits that the Smedley reference fails to disclose or suggest a method comprising calling one or more first functions to facilitate sharing of data among multiple data providers. Since neither Foody nor Smedley individually disclose or suggest this recited element of claim 28, applicant submits that the combination of Foody and Smedley fails to disclose or suggest this element of claim 28. Accordingly, applicant submits that claim 28 of the present application is patentable over Foody in view of Smedley.

Given that claims 29 and 30 depend from claim 28, applicant respectfully submits that claims 29 and 30 are likewise allowable over Foody in view of Smedley for at least the reasons discussed above.

Claims 9, 11, 24-25 and 31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Foody in view of Smedley as applied to claims 1-8, 10, 12-14, 17-23 and 26-30 above, and further in view of U.S. Patent No. 6,360,266 to Pettus (hereinafter "Pettus"). Applicant respectfully submits that claims 9, 11, 24-25 and 31 are patentable over Foody in view of Smedley, and further in view of Pettus.

Pettus discloses:

On a multi-node client server network, a client node obtains access to remote services by means of a communications directory service located in each node of the network. The communications directory service includes a tree structure to which existing directory services and other network services can be added. The tree structure has a plurality of nodes each of which includes specific methods that query and browse the associated directory service if such actions are supported by the underlying service. The communications directory service further includes shared



libraries which store a service object associated with each service offered on the network. The service object, in turn, includes the service exchange address and communication link configuration information. A client desiring to access a remote service retrieves the appropriate service object from the communications directory service and uses the service object to set up the communications path. Abstract.

For the reasons discussed above, applicant submits that the Foody reference and the Smedley reference fail to disclose or suggest (alone or in combination with one another) an application program interface that includes a first namespace related to data shared by a plurality of data providers. Thus, applicant submits that claim 1 of the present application is patentable over Foody in view of Smedley.

The Pettus reference discloses a communications directory service that is used by client nodes to obtain access to remote services. This disclosure in Pettus is different from an application program interface that includes a first namespace related to data shared by a plurality of data providers, as recited in claim 1. As such, applicant submits that the combination of Foody, Smedley and Pettus fails to disclose or suggest this element of claim 1. Given that claims 9 and 11 depend from claim 1, applicant respectfully submits that claims 9 and 11 are allowable over Foody in view of Smedley, and further in view of Pettus.

Regarding claim 22, for the reasons discussed above applicant submits that the Foody reference and the Smedley reference fail to disclose or suggest (alone or in combination with one another) a method that includes creating a common namespace related to data shared by a plurality of data providers. Thus, applicant submits that claim 22 of the present application is patentable over Foody in view of Smedley.

Based on the discussion above, the Pettus reference fails to disclose or suggest a method that includes creating a common namespace related to data shared by a plurality of data providers, as recited in claim 22. As such, applicant submits that the combination of Foody, Smedley and Pettus fails to disclose or suggest this element of claim 22. Given that claims 24 and 25 depend from claim 22, applicant respectfully submits that claims 24 and 25 are allowable over Foody in view of Smedley, and further in view of Pettus. why use  
pettus

Regarding claim 28, for the reasons discussed above applicant submits that the Foody reference and the Smedley reference fail to disclose or suggest (alone or in combination with one another) a method comprising calling one or more first functions to facilitate sharing of data among multiple data providers. Thus, applicant submits that claim 28 of the present application is patentable over Foody in view of Smedley.

For the reasons discussed above, the Pettus reference fails to disclose or suggest a method comprising calling one or more first functions to facilitate sharing of data among multiple data providers, as recited in claim 28. As such, applicant submits that the combination of Foody, Smedley and Pettus fails to disclose or suggest this element of claim 28. Given that claim 31 depends from claim 28, applicant respectfully submits that claim 31 is allowable over Foody in view of Smedley, and further in view of Pettus.

Claims 15 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Foody in view of Smedley as applied to claim 14 above, and further in view of U.S. Patent No. 6,446,253 to Mellmer (hereinafter "Mellmer").

Applicant respectfully submits that claims 15 and 16 are patentable over Foody in view of Smedley, and further in view of Mellmer.

Mellmer discloses:

A program framework for use in a networked system includes an abstract, protocol-independent storage system in which data sources are stored. The storage system is abstract because it includes data stored anywhere in the networked system, yet references to the data appear to the user as references to a local storage system. Associated with each data source is one or more views, where a view is a user defined logical interface for accessing the data source. The view is mapped to an implementation which identifies either or both of a communication protocol for accessing the data source and one or more tasks to be performed on the data source. As such, the logical interface to the data source is separated from the methods for implementing accessing or operating the resource. A programmer accesses data using one of the available views of the data. The functionality of the system may be easily expanded by adding different views to the data sources. In addition, because any program may access a data source using any of the available views, information can be seamlessly transferred between programs, thereby significantly reducing inter-program communication difficulties. Abstract.

As discussed above, applicant submits that the Foody reference and the Smedley reference fail to disclose or suggest (alone or in combination with one another) an application program interface that includes a first group of services related to sharing data among a plurality of data providers. Thus, applicant submits that claim 14 of the present application is patentable over Foody in view of Smedley.

The Mellmer reference discloses an abstract, protocol-independent storage system that describes one or more views associated with each data source. Each "view" is a user defined logical interface for accessing the data source. See Abstract. This disclosure of the Mellmer reference is different from an application

program interface that includes a first group of services related to sharing data among a plurality of data providers. Accordingly, applicant submits that Mellmer fails to disclose or suggest the elements of claim 14. As such, applicant submits that the combination of Foody, Smedley and Mellmer fails to disclose or suggest this element of claim 14. Given that claims 15 and 16 depend from claim 14, applicant respectfully submits that claims 15 and 16 are allowable over Foody in view of Smedley, and further in view of Mellmer.

Applicant respectfully requests that the §103 rejections be withdrawn.

### Conclusion

Claims 1-31 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

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